

EXHIBIT B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ROGER RECHLER REVOCABLE TRUST,
DENNIS SPRUNG, in his capacity as Trustee of
the ROGER RECHLER REVOCABLE TRUST,
SCOTT RECHLER, GREGG RECHLER, TODD
RECHLER, and EVELYN RECHLER,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04474 (SMB)

**ORDER PURSUANT TO RULES 15 AND 21 OF THE FEDERAL RULES OF CIVIL
PROCEDURE, AS INCORPORATED BY RULES 7015 AND 7021 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE, GRANTING THE TRUSTEE
LEAVE TO FILE AN AMENDED COMPLAINT AND FOR RELATED RELIEF**

Upon the motion dated May 31, 2016 (the “Motion”) of Irving H. Picard (the “Trustee”),
as Trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC
and the substantively consolidated estate of Bernard L. Madoff under the Securities Investor
Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, seeking entry of an order, pursuant to Rules 15 and

21 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, granting the Trustee's request for leave to file an Amended Complaint and for Related Relief; and the Court having considered the Memorandum of Law in Support of the Trustee's Motion for Entry of an Order Pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as Incorporated by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, Granting the Trustee Leave to File an Amended Complaint and for Related Relief; and any objections thereto; and due notice of the Motion having been given, and it appearing that no other or further notice need be given; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon the proceedings before the Court and after due deliberation, it is hereby

ORDERED THAT:

1. The Trustee is granted leave to file his Amended Complaint; and
2. The caption for this adversary proceeding is amended and shall appear as indicated in Exhibit A to this order.

Dated: New York, New York
_____, 2016

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

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SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff-Applicant,

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Defendants.

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